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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

MARK FITZ, GRAYGUNS, INC.;
G4 ARCHERY, LLC; SECOND
AMENDMENT FOUNDATION; and
FIREARMS POLICY COALITION,
INC.,

Plaintiffs,

v.

ELLEN ROSENBLUM, in her official
capacity as Attorney General of the
State of Oregon; and TERRI DAVIE,
in her official capacity as
Superintendent of the Oregon State
Police,

Defendants.

Case No.

**DECLARATION OF BRANDON
COMBS IN SUPPORT OF
PLAINTIFFS' EMERGENCY
MOTIONS FOR A TEMPORARY
RESTRAINING ORDER AND
PRELIMINARY INJUNCTION**

I, Brandon Combs, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following statements are true and correct to the best of my knowledge:

1. I am over 18 years of age, competent to testify, and have personal knowledge of the matters stated herein. I make this Declaration in support of plaintiffs' emergency motions for a temporary restraining order and preliminary injunction.

2. I am the President of Firearms Policy Coalition, Inc. (“FPC”) and have held that position since FPC was founded in 2014. As President, I am duly authorized to act on behalf of the organization. FPC is a tax-exempt nonprofit organization under section 501(c)(4) of the Internal Revenue Code, incorporated under the laws of Delaware, with its principal place of business in Las Vegas, Nevada.

3. As President, I oversee and often participate directly in FPC’s review of and commentary on issues affecting members, communications informing members of issues affecting them, and process for evaluating involvement in litigation.

4. FPC’s purpose is to advocate for individual liberties, restoring freedom, and important constitutionally protected rights—especially those protected under the First, Second, Fifth, and Fourteenth Amendments—sound public policy, and related issues. FPC further helps individuals throughout the United States by protecting, defending, and advancing the means and methods by which the People of the United States may exercise their right to keep and bear arms. This includes, but is not limited to, the acquisition, construction, collection, transportation, exhibition, carry, care, use, and disposition of arms for all lawful purposes.

5. FPC accomplishes its mission, serves its members, and serves the public through legislative advocacy, grassroots advocacy, litigation and legal efforts, criminal defense of individuals prosecuted under unconstitutional laws, research, education, outreach, and other programs.

6. FPC brings this lawsuit on behalf of itself and its members in Oregon in a representative capacity.

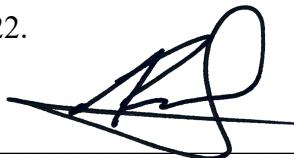
7. FPC's membership includes numerous individuals and businesses, including Plaintiff Mark Fitz and other Oregon resident members.

8. FPC offers several ways for individuals and entities to become members. First, individual membership in FPC can be acquired through purchase, typically \$30 per year (although discounts are available from time to time), and are available on FPC's website at <http://JoinFPC.org>. Additionally, FPC will also, on occasion, grant individuals and entities membership for support of the organization, its mission, and its activities. Finally, FPC also has "Constitutional Alliance" members, who are corporate members that partner with FPC to directly support the ongoing efforts of FPC to protect individual rights.

9. One membership benefit the FPC provides to its members is an ability to participate in FPC's mission and to support FPC's work. In addition, members will typically receive a membership kit that includes a letter of thanks, a membership card, and sometimes other miscellaneous items.

10. FPC members in Oregon own and possess ammunition magazines capable of holding more than 10 rounds and are thereby impacted by Measure 114's regulation of the purchase, possession, production, and sale of such magazines.

DATED this 30th day of November, 2022.



Brandon Combs
President
Firearms Policy Coalition, Inc.